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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION

This Document Relates To:

Epic Games, Inc. v. Google LLC et al., Case
No. 3:20-cv-05671-JD

In re Google Play Consumer Antitrust
Litigation, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al., Case
No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

DECLARATION OF DUY HO IN
SUPPORT OF DEFENDANTS'
BRIEF IN RESPONSE TO THE
COURT'S QUESTIONS
REGARDING PRESERVATION OF
CHAT MESSAGES

Judge: Hon. James Donato

1 **DECLARATION OF DUY HO**

2 I, Duy Ho, declare as follows:

3 1. I am a Project Manager on the Legal Discovery team at Google. I make this
4 declaration based on personal knowledge. If called as a witness, I could testify competently to the
5 facts stated herein.

6 2. My job-specific responsibilities include managing the technical aspects of
7 discovery in connection with litigation matters. In connection with this matter, I have managed
8 vendor operation of the document review database, overseen processes for producing large
9 datasets, and assisted with analysis of review and production metrics. As a member of the Legal
10 Discovery team supporting this case, I have reviewed the list of custodians whose documents the
11 parties have agreed will be searched in this case (“agreed-upon custodians”), including the date
12 ranges that the parties have agreed will be applied to those searches.

13 **Collection of Preserved Chats for Each Legal Hold Notice Recipient**

14 3. In connection with this declaration, my team collected all preserved chat messages
15 for all employees on legal hold for this matter, from the date of the initial legal hold notice,
16 September 11, 2020, to the present. I have been asked to analyze those chats and, working with
17 members of my team, I have prepared a chart identifying the number of Google chats that were
18 preserved for each employee on legal hold, and to the extent possible, to identify the chat as (1)
19 from a threaded room, with history always on (a feature of the product) and is thus automatically
20 preserved in connection with a legal hold; or (2) a chat that requires an individual user to
21 personally elect to enable “history on” to preserve the conversation. Counsel further requested
22 that I include the approximate date of the first and last preserved Google chat, for both threaded
23 chats and one-on-one or group chats, for each person.

24 4. Attached as **Exhibit A** is a table showing this information. Specifically, for each
25 employee on legal hold for this matter, the table shows in Columns A and D the number of “One-
26 to-One or Group” chats and “Threaded” chats, respectively, that Google has preserved, and in the
27 remaining columns the approximate dates of the first and last preserved chats for each
28 category. The table is also divided into three groups of employees on legal hold: (1) those who

1 were agreed-upon custodians with an agreed-upon date range for searching custodial documents
2 that *post*-dated the filing of the initial lawsuit in this case (August 13, 2020) (“post-complaint
3 custodians”); (2) those who were agreed-upon custodians with an agreed-upon date range for
4 searching custodial documents that *pre*-dated the lawsuit’s filing; and (3) all other employees on
5 legal hold for this matter (i.e., non-custodians). Having reviewed some of the collected chats and
6 our external-facing materials describing how chats are stored, I understand that each “chat”
7 collected and shown in this table represents a snapshot of a chat conversation (either bound by
8 time or by a number of individual messages sent close in time to each other).

9 **Produced Documents for Post-Complaint Custodians**

10 5. I have also prepared a separate table, attached as **Exhibit B**, showing the total
11 number of documents that Google has produced for each of the post-complaint custodians (i.e., the
12 agreed-upon custodians with an agreed-upon date range for searching custodial documents that
13 *post*-dated the filing of the initial lawsuit in this case). This table shows the number of
14 documents—including emails, slide decks, and other documents—dated after the filing of the
15 initial lawsuit in this case. The numbers in this table accurately show what I am able to see in our
16 document management database. Based on our document database, Google has produced 93,199
17 unique custodial documents—or 1,263,688 pages—for these post-complaint custodians in
18 particular.

19 **Produced Documents on New Developments After Filing of Complaint**

20 6. Finally, I have also analyzed our production to determine the number of documents
21 that Google has produced, at Plaintiffs’ request, relating to new developments arising after the
22 filing of the initial lawsuit on August 13, 2020. For this analysis, Google’s counsel provided to
23 me a list of new developments that prompted a production request by Plaintiffs, and the agreed-
24 upon search terms for those developments. I then used those search terms and applied them to the
25 universe of post-complaint custodians’ documents dated after the filing of the initial complaint, to
26 determine the number of produced documents that relate to those new developments.

27 7. After running this analysis, I found that Google produced, for example: 28,322
28 documents relating to its extension of the compliance deadline for the Play payments policy;

1 17,183 documents relating to Google's announcement of its user choice billing pilot program;
2 8,942 documents relating to Google's announcement and consideration of service fee reductions;
3 2,744 documents relating to a specific action Google took in connection with a Korean app
4 developer in Korea; and 2,500 documents relating to Google's release of a new version of
5 Android.¹

6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct.

8 Executed on this 24th day of January, 2023, in California.

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DocuSigned by:
Duy Ho
Duy Ho 659ED0910AF2455...

¹ The specific descriptions of these developments were simply provided to me by counsel. My role was to analyze our production data based on the agreed-upon search terms that were associated with these developments.

EXHIBIT A

Exhibit A – Declaration of Duy Ho

	A	B	C	D	E	F
Post-Complaint Custodian	One-to-One or Group #	First Chat (month)	Last Chat (month)	Threaded #	First Chat (month)	Last Chat (month)
1	102	9-2020	2-2021	406	9-2020	10-2021
2	348	9-2020	1-2023	6	10-2020	8-2021
3	469	9-2020	1-2023	320	9-2020	1-2023
4	451	9-2020	1-2023	3,866	10-2020	7-2022
5	267	9-2020	1-2023	2,205	9-2020	1-2023
6	739	9-2020	1-2023	2,314	9-2020	1-2023
7	181	9-2020	1-2023	1,023	9-2020	1-2023
8	74	9-2020	1-2023	1,825	9-2020	1-2023
9	27	9-2020	12-2022	166	9-2020	1-2023
10	627	9-2020	1-2023	904	9-2020	1-2023
11	274	9-2020	1-2023	984	9-2020	1-2023
12	465	9-2020	1-2023	346	9-2020	12-2021
13	85	10-2020	12-2022	10	10-2020	11-2021
14	175	9-2020	1-2023	1,595	9-2020	1-2023
15	10	11-2020	1-2023	162	10-2020	12-2022
16	474	9-2020	1-2023	90	9-2020	1-2023
17	512	9-2020	1-2023	287	9-2020	1-2023
18	644	9-2020	1-2023	10,017	9-2020	1-2023
19	509	9-2020	1-2023	1,364	9-2020	1-2023
20	453	11-2021	1-2023	15	9-2022	1-2023
21	642	9-2020	1-2023	2,014	9-2020	1-2023
Other Custodians	One-to-One or Group #	First Chat (month)	Last Chat (month)	Threaded #	First Chat (month)	Last Chat (month)
22	583	9-2020	1-2023	621	9-2020	11-2022
23	1,975	9-2020	12-2022	174	10-2020	12-2021
24	1,367	9-2020	1-2023	25,145	9-2020	1-2023
25	288	9-2020	1-2023	1,108	9-2020	1-2023
26	105	10-2020	12-2022	1,600	9-2020	1-2023
27	444	9-2020	1-2023	1,949	9-2020	1-2023
28	814	9-2020	1-2023	333	9-2020	1-2023
29	184	9-2020	1-2023	4,791	9-2020	1-2023
30	725	9-2020	1-2023	3,272	9-2020	1-2023
31	591	12-2020	1-2023	15,813	9-2020	1-2023
32	26	9-2020	11-2020	181	9-2020	5-2021
33	140	9-2020	12-2022	81	3-2021	12-2022
34	403	9-2020	1-2023	203	9-2020	1-2023
35	496	9-2020	1-2023	44,079	9-2020	1-2023

Exhibit A – Declaration of Duy Ho

36	7	7-2022	1-2023	0	N/A	N/A
37	515	9-2020	1-2023	548	10-2020	1-2023
38	1,008	9-2020	1-2023	8,754	9-2020	1-2023
39	0	N/A	N/A	0	N/A	N/A
40	265	11-2020	1-2023	2,441	9-2020	1-2023
41	0	N/A	N/A	0	N/A	N/A
42	335	9-2020	1-2023	150	10-2020	1-2023
43	1,767	9-2020	1-2023	974	9-2020	1-2023
44	522	9-2020	1-2023	3,124	9-2020	1-2023
Others on Legal Hold	One-to-One or Group #	First Chat (month)	Last Chat (month)	Threaded #	First Chat (month)	Last Chat (month)
45	944	9-2020	1-2023	4,104	9-2020	1-2023
46	315	9-2020	1-2023	503	12-2020	1-2023
47	920	9-2020	1-2023	13,928	9-2020	1-2023
48	731	9-2020	1-2023	1,912	9-2020	1-2023
49	358	9-2020	1-2023	8	12-2020	5-2021
50	3,177	9-2020	1-2023	4,200	9-2020	1-2023
51	0	N/A	N/A	0	N/A	N/A
52	928	9-2020	1-2023	2,123	9-2020	1-2023
53	0	N/A	N/A	0	N/A	N/A
54	548	9-2020	1-2023	500	9-2020	1-2023
55	306	9-2020	1-2023	5,032	9-2020	1-2023
56	527	10-2020	1-2023	1,036	9-2020	1-2023
57	1,550	9-2020	1-2023	1,414	9-2020	1-2023
58	239	11-2020	1-2023	2,725	9-2020	1-2023
59	2,282	9-2020	1-2023	7,840	9-2020	1-2023
60	289	5-2022	1-2023	3,611	11-2020	1-2023
61	1,565	9-2020	10-2022	50	1-2021	11-2022
62	268	9-2020	1-2023	7	1-2021	9-2021
63	532	9-2020	1-2023	1,720	9-2020	1-2023
64	1,198	9-2020	1-2023	1,176	9-2020	1-2023
65	0	N/A	N/A	0	N/A	N/A
66	0	N/A	N/A	0	N/A	N/A
67	960	9-2020	1-2023	7,946	9-2020	1-2023
68	2,397	9-2020	1-2023	2,533	9-2020	1-2023
69	603	9-2020	1-2023	1,611	9-2020	1-2023
70	392	10-2020	1-2023	2,731	9-2020	1-2023
71	183	9-2020	1-2023	64	9-2020	12-2022
72	1,164	9-2020	1-2023	955	9-2020	1-2023
73	510	9-2020	1-2023	1,360	9-2020	1-2023
74	434	9-2020	8-2021	197	3-2021	11-2022
75	1,054	9-2020	10-2022	3,543	9-2020	1-2023

Exhibit A – Declaration of Duy Ho

76	2,126	9-2020	1-2023	531	10-2020	1-2023
77	657	9-2020	1-2023	1,308	9-2020	1-2023
78	34	12-2020	6-2021	1	7-2021	7-2021
79	519	4-2021	1-2023	22	9-2020	4-2022
80	1,171	9-2020	1-2023	6,209	9-2020	1-2023
81	1,028	9-2020	1-2023	2,929	9-2020	1-2023
82	2,469	9-2020	1-2023	3,126	9-2020	1-2023
83	578	9-2020	1-2023	14	7-2021	11-2021
84	509	9-2020	12-2022	11,519	9-2020	1-2023
85	2,902	9-2020	1-2023	1,095	9-2020	1-2023
86	1,003	9-2020	1-2023	1,768	9-2020	1-2023
87	1,435	9-2020	1-2023	7,202	9-2020	1-2023
88	285	12-2020	1-2023	5,504	9-2020	1-2023
89	702	9-2020	1-2023	377	9-2020	1-2023
90	221	9-2020	1-2022	1,175	9-2020	1-2023
91	353	9-2020	1-2023	47	11-2020	11-2021
92	229	9-2020	1-2023	104	11-2020	1-2023
93	1,114	9-2020	1-2023	354	1-2020	1-2023
94	611	9-2020	1-2023	13	9-2020	12-2020
95	345	9-2020	1-2023	1,851	9-2020	1-2023
96	1,285	9-2020	1-2023	11,134	9-2020	1-2023
97	848	9-2020	1-2023	1,090	9-2020	1-2023
98	931	9-2020	1-2023	4,360	9-2020	1-2023
99	93	12-2020	1-2022	67	9-2020	6-2022
100	815	9-2020	9-2022	2,111	9-2020	1-2023
101	934	9-2020	1-2023	10,068	9-2020	1-2023
102	361	11-2020	1-2023	1,761	9-2020	1-2023
103	1,078	9-2020	1-2023	1,312	9-2020	1-2023
104	1,161	9-2020	1-2023	11,741	9-2020	1-2023
105	556	9-2020	1-2023	27,144	9-2020	1-2023
106	705	11-2020	1-2023	2,973	9-2020	1-2023
107	0	N/A	N/A	0	N/A	N/A
108	162	9-2020	12-2022	129	9-2020	9-2022
109	219	9-2020	1-2023	1,420	10-2020	1-2023
110	489	9-2020	1-2022	13	9-2020	7-2021
111	0	N/A	N/A	0	N/A	N/A
112	1,309	12-2020	1-2023	7,022	9-2020	1-2023
113	0	N/A	N/A	0	N/A	N/A
114	1,931	9-2020	1-2023	3,425	9-2020	1-2023
115	1,578	9-2020	1-2023	762	9-2020	1-2023
116	320	9-2020	1-2023	246	9-2021	1-2023
117	1,086	9-2020	1-2023	77	9-2020	12-2022
118	20	9-2020	10-2020	6	9-2020	12-2020

Exhibit A – Declaration of Duy Ho

119	1,654	9-2020	1-2023	150	10-2020	1-2023
120	480	9-2020	1-2023	8,377	9-2020	1-2023
121	1,210	9-2020	1-2023	23,532	9-2020	1-2023
122	144	11-2020	1-2023	48	9-2020	12-2022
123	1,477	9-2020	1-2023	900	9-2020	1-2023
124	677	9-2020	1-2023	3,725	9-2020	1-2023
125	260	9-2020	10-2021	177	9-2020	9-2021
126	1,019	9-2020	1-2023	1,617	9-2020	1-2023
127	709	11-2020	1-2023	58	9-2020	1-2023
128	582	2-2021	1-2023	1,040	9-2020	1-2023
129	337	9-2020	1-2023	98	10-2020	12-2022
130	644	9-2020	1-2023	535	9-2020	1-2023
131	142	9-2020	1-2023	3,044	9-2020	1-2023
132	81	9-2020	1-2023	57	3-2021	1-2023
133	9	9-2020	3-2021	123	9-2020	11-2022
134	82	8-2022	1-2023	56	8-2022	1-2023
135	413	9-2020	1-2023	4,164	9-2020	1-2023
136	1,454	9-2020	1-2023	1,844	9-2020	1-2023
137	0	N/A	N/A	0	N/A	N/A
138	0	N/A	N/A	0	N/A	N/A
139	937	9-2020	1-2023	4,832	9-2020	1-2023
140	537	9-2020	1-2023	1,677	9-2020	1-2023
141	1,797	9-2020	1-2023	2,227	10-2020	1-2023
142	293	2-2021	1-2023	80	9-2020	1-2023
143	406	11-2020	1-2023	5,975	9-2020	1-2023
144	829	12-2020	1-2023	1,456	9-2020	1-2023
145	179	9-2020	12-2022	165	9-2020	1-2023
146	1,234	9-2020	1-2023	7,838	9-2020	1-2023
147	549	9-2020	1-2023	4,717	9-2020	1-2023
148	606	9-2020	1-2023	1,386	9-2020	1-2023
149	148	9-2021	1-2023	449	9-2020	12-2022
150	624	9-2020	1-2023	701	9-2020	1-2023
151	1,054	9-2020	1-2023	1,670	9-2020	1-2023
152	874	9-2020	1-2023	401	9-2020	12-2022
153	635	9-2020	1-2023	768	9-2020	1-2023
154	1,143	9-2020	1-2023	793	9-2020	1-2023
155	525	9-2020	1-2023	539	9-2020	3-2022
156	4,666	9-2020	1-2023	2,635	9-2020	1-2023
157	0	N/A	N/A	0	N/A	N/A
158	703	9-2020	1-2023	11,098	9-2020	1-2023
159	1,498	9-2020	1-2023	0	N/A	N/A
160	754	10-2020	1-2023	354	10-2020	1-2023
161	71	11-2020	10-2021	5,766	9-2020	1-2023

Exhibit A – Declaration of Duy Ho

162	575	9-2020	1-2023	270	11-2020	1-2023
163	289	9-2020	12-2020	134	9-2020	7-2022
164	241	9-2020	1-2023	201	11-2020	1-2023
165	0	N/A	N/A	5	9-2020	11-2020
166	1,100	9-2020	1-2023	1,924	9-2020	1-2023
167	848	9-2020	1-2023	417	9-2020	1-2023
168	1,609	9-2020	1-2023	71	9-2020	12-2021
169	3,167	9-2020	1-2023	1,154	9-2020	1-2023
170	679	9-2020	1-2023	1,150	9-2020	1-2023
171	104	11-2020	1-2023	365	9-2020	1-2023
172	633	12-2020	1-2023	6	3-2021	11-2021
173	983	9-2020	1-2023	399	9-2020	1-2023
174	0	N/A	N/A	0	N/A	N/A
175	198	12-2020	11-2022	808	9-2020	7-2022
176	872	9-2020	1-2023	4,587	9-2020	1-2023
177	273	9-2020	2-2021	211	9-2020	1-2023
178	623	9-2020	1-2023	623	9-2020	1-2023
179	0	N/A	N/A	0	N/A	N/A
180	2,173	9-2020	1-2023	2,051	9-2020	1-2023
181	664	9-2020	1-2023	12,324	9-2020	1-2023
182	257	9-2020	1-2023	59	9-2020	12-2022
183	1,118	9-2020	1-2023	4,793	9-2020	1-2023
184	180	10-2020	11-2022	28	10-2020	1-2023
185	215	12-2020	1-2023	280	9-2020	1-2023
186	1,399	9-2020	1-2023	157	9-2020	11-2022
187	164	9-2020	1-2023	1,809	9-2020	1-2023
188	968	9-2020	1-2023	3,676	9-2020	1-2023
189	332	9-2020	12-2022	282	9-2020	1-2023
190	1,277	9-2020	7-2022	1,322	9-2020	1-2023
191	1,037	9-2020	1-2023	916	9-2020	1-2023
192	414	9-2020	1-2023	1,219	9-2020	1-2023
193	40	9-2020	12-2022	3	12-2020	3-2022
194	633	9-2020	1-2023	82	9-2020	9-2021
195	406	11-2020	1-2023	650	9-2020	1-2023
196	1,054	9-2020	1-2023	851	9-2020	1-2023
197	1,538	9-2020	1-2023	2,756	9-2020	1-2023
198	203	3-2022	1-2023	0	N/A	N/A
199	0	N/A	N/A	0	N/A	N/A
200	696	9-2020	1-2023	6,520	9-2020	1-2023
201	456	9-2020	1-2023	427	9-2020	1-2023
202	1,417	9-2020	1-2023	6,420	9-2020	1-2023
203	1,620	9-2020	1-2023	336	9-2020	1-2023
204	218	8-2021	12-2022	27	9-2020	4-2022

Exhibit A – Declaration of Duy Ho

205	577	9-2020	1-2023	22	9-2020	3-2022
206	1,372	9-2020	1-2023	480	9-2020	1-2023
207	660	9-2020	1-2023	680	9-2020	1-2023
208	1,497	9-2020	1-2023	2,190	9-2020	1-2023
209	227	9-2020	1-2023	263	9-2020	1-2023
210	509	9-2021	1-2023	169	2-2021	1-2023
211	517	11-2020	1-2023	938	9-2020	1-2023
212	483	9-2020	1-2023	285	9-2020	1-2023
213	263	10-2020	5-2022	168	9-2020	8-2022
214	220	9-2020	1-2023	348	9-2020	1-2023
215	1,803	9-2020	1-2023	477	9-2020	1-2023
216	382	9-2020	1-2023	2,378	9-2020	1-2023
217	398	12-2020	1-2023	123	9-2020	6-2022
218	460	9-2020	1-2023	333	9-2020	1-2023
219	1,019	11-2020	1-2023	407	9-2020	1-2023
220	0	N/A	N/A	0	N/A	N/A
221	902	9-2020	10-2022	1,025	9-2020	1-2023
222	1,545	9-2020	1-2023	689	9-2020	1-2023
223	884	9-2020	1-2023	1,957	9-2020	1-2023
224	285	9-2020	1-2023	145	9-2020	12-2022
225	1,551	9-2020	1-2023	1,770	9-2020	1-2023
226	791	9-2020	1-2023	4,501	9-2020	1-2023
227	58	10-2020	6-2021	14	1-2021	3-2022
228	881	9-2020	1-2023	249	9-2020	1-2023
229	84	9-2020	4-2021	1,986	9-2020	1-2023
230	989	9-2020	1-2023	733	9-2020	1-2023
231	148	6-2021	1-2023	1,016	9-2020	1-2023
232	501	9-2020	12-2022	73	9-2020	3-2022
233	1,051	9-2020	1-2023	326	3-2021	1-2023
234	716	12-2020	1-2023	1,759	9-2020	1-2023
235	626	9-2020	1-2023	2,021	9-2020	1-2023
236	745	7-2021	1-2023	2,176	9-2020	1-2023
237	1,961	10-2020	1-2023	256	3-2021	1-2023
238	744	9-2020	1-2023	3,259	9-2020	1-2023
239	286	9-2020	1-2023	11	1-2021	11-2021
240	176	9-2020	1-2023	4,487	9-2020	1-2023
241	245	9-2020	1-2023	873	9-2020	1-2023
242	638	9-2020	1-2023	240	2-2021	1-2023
243	415	3-2021	1-2023	43	9-2020	1-2023
244	149	9-2021	1-2023	471	9-2020	8-2022
245	254	11-2020	1-2023	439	9-2020	1-2023
246	111	9-2020	1-2023	977	9-2020	1-2023
247	0	N/A	N/A	0	N/A	N/A

Exhibit A – Declaration of Duy Ho

248	213	9-2020	1-2023	609	9-2020	1-2023
249	567	9-2020	1-2023	3,358	9-2020	1-2023
250	577	10-2020	1-2023	521	9-2020	1-2023
251	959	9-2020	1-2023	73	9-2020	5-2022
252	0	N/A	N/A	0	N/A	N/A
253	692	9-2020	1-2023	8,095	9-2020	1-2023
254	787	10-2020	1-2023	3,892	9-2020	1-2023
255	14	11-2020	12-2022	0	N/A	N/A
256	0	N/A	N/A	0	N/A	N/A
257	232	9-2020	1-2023	65	9-2020	5-2022
258	151	9-2020	1-2023	30	11-2022	12-2022
259	686	9-2020	1-2023	243	9-2020	12-2022
260	17	12-2020	3-2021	2	12-2020	9-2021
261	1,403	9-2020	1-2023	1,556	9-2020	1-2023
262	286	9-2020	1-2023	5	1-2021	3-2022
263	14	9-2020	7-2021	39	10-2020	10-2021
264	1,276	9-2020	1-2023	408	9-2020	1-2023
265	958	9-2020	1-2023	497	10-2020	1-2023
266	204	9-2020	3-2021	1,696	9-2020	1-2023
267	479	9-2020	1-2023	1,513	9-2020	1-2023
268	1,251	9-2020	1-2023	5,473	9-2020	1-2023
269	92	9-2020	7-2022	5,617	9-2020	1-2023
270	428	9-2020	1-2023	1,310	9-2020	1-2023
271	522	9-2020	1-2023	3,198	9-2020	1-2023
272	702	9-2020	1-2023	695	9-2020	12-2022
273	879	9-2020	1-2023	3,252	9-2020	1-2023
274	818	9-2020	1-2023	1,319	9-2020	1-2023
275	0	N/A	N/A	0	N/A	N/A
276	41	9-2020	1-2023	2,117	9-2020	1-2023
277	0	N/A	N/A	0	N/A	N/A
278	0	N/A	N/A	0	N/A	N/A
279	665	9-2020	1-2023	1,422	9-2020	1-2023
280	931	11-2020	1-2023	4,427	9-2020	1-2023
281	620	12-2020	1-2023	600	10-2020	1-2023
282	2,380	9-2020	1-2023	5	3-2021	11-2021
283	2,162	9-2020	1-2023	612	10-2020	1-2023
284	480	9-2020	1-2023	1,856	9-2020	1-2023
285	786	9-2020	1-2023	2,349	9-2020	1-2023
286	1,039	9-2020	1-2023	294	9-2020	1-2023
287	757	9-2020	1-2023	10	10-2020	8-2022
288	666	9-2020	1-2023	14,854	9-2020	1-2023
289	743	11-2020	1-2023	594	3-2021	1-2023
290	498	9-2020	1-2023	388	10-2020	1-2023

Exhibit A – Declaration of Duy Ho

291	747	9-2020	1-2023	452	9-2020	1-2023
292	138	9-2020	2-2021	0	N/A	N/A
293	1,260	9-2020	1-2023	5,718	9-2020	1-2023
294	5	9-2020	9-2020	1,711	9-2020	1-2023
295	630	9-2020	1-2023	700	9-2020	1-2023
296	1,238	9-2020	1-2023	1,885	9-2020	1-2023
297	711	9-2020	1-2023	450	9-2020	1-2023
298	524	9-2020	1-2023	1,688	9-2020	1-2023
299	1,154	9-2020	1-2023	1,565	9-2020	1-2023
300	193	10-2020	1-2023	3,892	9-2020	1-2023
301	228	9-2020	1-2023	71	9-2020	5-2022
302	3	N/A	N/A	0	N/A	N/A
303	1,242	9-2020	1-2023	1,031	9-2020	1-2023
304	131	10-2020	1-2023	64	9-2020	5-2022
305	458	9-2020	1-2023	80	1-2021	12-2022
306	1,364	9-2020	1-2023	23,690	9-2020	1-2023
307	81	12-2020	3-2021	48	9-2020	7-2021
308	845	9-2020	11-2022	374	9-2020	1-2023
309	1,825	9-2020	1-2023	10,705	9-2020	1-2023
310	48	9-2020	1-2023	246	10-2020	1-2023
311	331	9-2020	1-2023	2,345	9-2020	1-2023
312	2,749	9-2020	1-2023	6,360	9-2020	1-2023
313	432	9-2020	7-2022	4,450	10-2020	1-2023
314	699	10-2020	1-2023	2,900	9-2020	1-2023
315	559	9-2020	1-2023	186	9-2020	12-2022
316	122	9-2020	12-2022	133	9-2020	6-2022
317	154	9-2020	1-2023	133	9-2020	12-2022
318	2,417	9-2020	1-2023	21,500	9-2020	1-2023
319	200	9-2020	2-2021	63	9-2020	10-2021
320	103	3-2021	6-2022	2,204	9-2020	1-2023
321	2,112	9-2020	1-2023	3,586	9-2020	1-2023
322	85	12-2020	12-2022	87	9-2020	9-2022
323	519	9-2020	1-2021	47	9-2020	2-2021
324	0	N/A	N/A	0	N/A	N/A
325	138	9-2020	1-2023	8,452	10-2020	1-2023
326	845	9-2020	1-2023	104	11-2020	12-2022
327	379	9-2020	12-2022	35	9-2020	12-2022
328	298	9-2020	1-2023	1,188	9-2020	1-2023
329	847	9-2020	1-2023	216	9-2020	12-2022
330	355	10-2020	1-2023	11,755	9-2020	1-2023
331	3,132	9-2020	1-2023	631	9-2020	1-2023
332	1,231	9-2020	1-2023	2,783	9-2020	1-2023
333	1,950	9-2020	1-2023	44	9-2020	4-2021

Exhibit A – Declaration of Duy Ho

334	0	N/A	N/A	0	N/A	N/A
335	179	9-2020	10-2021	6	10-2020	1-2021
336	93	9-2020	7-2021	3,686	9-2020	1-2023
337	407	9-2020	9-2021	92	9-2020	6-2021
338	139	9-2020	1-2023	285	9-2020	12-2022
339	166	2-2022	1-2023	13	10-2020	11-2021
340	1,551	9-2020	1-2023	896	9-2020	1-2023
341	0	N/A	N/A	0	N/A	N/A
342	174	9-2020	1-2023	358	9-2020	1-2023
343	733	1-2021	1-2023	1,165	9-2020	1-2023
344	145	9-2020	1-2023	533	2-2021	1-2023
345	824	11-2020	1-2023	370	9-2020	1-2023
346	1,222	9-2020	1-2023	1,606	9-2020	1-2023
347	1,026	9-2020	1-2023	2,094	9-2020	1-2023
348	101	10-2020	1-2023	7,938	9-2020	1-2023
349	529	9-2020	1-2023	525	9-2020	1-2023
350	542	10-2020	1-2023	5,581	9-2020	1-2023
351	1,519	9-2020	1-2023	35,016	9-2020	1-2023
352	2,758	9-2020	1-2023	1,463	9-2020	1-2023
353	0	N/A	N/A	0	N/A	N/A
354	856	9-2020	1-2023	233	9-2020	11-2022
355	525	9-2020	1-2023	2,006	9-2020	1-2023
356	131	9-2020	1-2023	1,374	9-2020	1-2023
357	1,190	9-2020	1-2023	1,905	9-2020	1-2023
358	1,794	9-2020	1-2023	538	9-2020	1-2023
359	3,154	9-2020	1-2023	6,419	9-2020	1-2023
360	371	9-2020	1-2023	2,335	9-2020	1-2023
361	889	9-2020	1-2023	6,875	9-2020	1-2023
362	164	9-2020	1-2023	155	9-2020	1-2023
363	1,427	9-2020	1-2023	8,619	9-2020	1-2023
364	109	10-2020	1-2023	3,740	10-2020	1-2023
365	3	N/A	N/A	0	N/A	N/A
366	1,460	9-2020	1-2023	7,759	9-2020	1-2023
367	1,943	9-2020	1-2023	2,309	9-2020	1-2023
368	0	N/A	N/A	0	N/A	N/A
369	384	9-2020	1-2023	7,592	9-2020	1-2023
370	1,626	9-2020	1-2023	3,878	9-2020	1-2023
371	611	9-2020	1-2023	130	9-2020	1-2023
372	510	9-2020	1-2023	26,206	9-2020	1-2023
373	1,781	9-2020	1-2023	641	10-2020	1-2023
374	687	9-2020	1-2023	3,332	9-2020	1-2023
375	1,174	9-2020	1-2023	2,932	9-2020	1-2023
376	1,084	9-2020	1-2023	1,046	9-2020	1-2023

Exhibit A – Declaration of Duy Ho

377	148	3-2021	1-2023	4,853	9-2020	1-2023
378	822	9-2020	1-2023	190	9-2020	12-2022
379	497	9-2020	1-2023	1,097	12-2020	1-2023
380	231	9-2020	1-2023	181	9-2020	6-2022
381	0	N/A	N/A	0	N/A	N/A
382	500	9-2020	1-2023	411	9-2020	8-2022
383	814	9-2020	1-2023	643	9-2020	1-2023

EXHIBIT B

Exhibit B – Declaration of Duy Ho

Post-Complaint Custodian	Produced Documents Dated After 8-13-2020
1	7,676
2	3,731
3	8,941
4	3,478
5	2,581
6	8,305
7	14,431
8	13,687
9	6,135
10	23,465
11	2,742
12	1,358
13	7,137
14	15,207
15	377
16	3,538
17	2,140
18	3,856
19	8,757
20	564
21	439